

1. This is the last OU to be created in Butte under Superfund. Delisting will occur soon. If the Greeley Neighborhood and Flat Area are not included as part of the Westside Soils OU, how can the extent of contamination in these areas be systematically and thoroughly investigated and remediated? What assurances does the public have that these areas will be systematically and thoroughly investigated and remediated.

Beginning in late spring of 2019 and continuing into 2020, EPA will begin fieldwork in support of a remedial investigation/feasibility (RI/FS) study for the West Side Soils Operable Unit (WSSOU) as part of its cleanup efforts at the Silver Bow Creek/Butte Area Superfund site. The WSSOU is generally north and west of the Butte Priority Soils Operable Unit (BPSOU), but the boundary of the WSSOU is currently undetermined. It includes mining-impacted areas not addressed by actions at other parts of the Superfund site. The WSSOU contains several hundred mine claims with smaller disturbances associated with exploration, as well as several larger abandoned mines. The RI/FS will determine the boundary of the OU dependent on the nature and extent of contamination from past mining activities. The public is assured that EPA will investigate the Greeley Neighborhood during the RI/FS.

Commented [WC1]: Is this correct?

2. If the area south of Continental Drive including the Greeley Neighborhood is not part of an established legally constituted Operable Unit under Superfund, does the EPA have an enforcement mechanism under Superfund to use to remediate the area? If not part of a designated OU does the area south of Continental Drive qualify for remediation under Superfund?

The RI/FS will determine the nature and extent of contamination along with the operable unit boundary. Typically, if an area or neighborhood is not included in an official Superfund boundary after an RI/FS has been completed it has been determined that contamination from past mining activities do not pose a threat to human health or the environment in that area.

Need some language on John's question on enforcement mechanism

3. Does EPA agree that the arsenic contaminated dust that has been found in some attics in the Greeley Neighborhood is smelter dust and therefore considered as mine waste from past mining activity and due remediation under Superfund as has occurred in the BPSOU and Anaconda?

Again, need some help on this one. I guess we could state we plan to expand the RMAP program to the Greeley neighborhood and beyond as part of the Proposed Plan/revised CD?

4. If a formal RI/FS process is not conducted for the Greeley Neighborhood and the Flat, how can residents have any confidence that the full extent of contamination in the area has been determined?

EPA's RI/FS process will determine if there is historic mining waste and contamination that needs to be remediated. This RI/FS will be conducted for the WSSOU. EPA will determine the

OU boundary based on data collected, and will continue to engage with and inform the community throughout this process.

5. What provisions are being made for addressing the environmental justice community in the Greeley Neighborhood?

EPA has recently engaged with the Greeley Neighborhood Association, specifically Ed Banderob, to determine their communication and EJ needs.

6. When will the public know as to whether or not the RMAP program has been “officially” extended to the Greeley Neighborhood and the Flat?

The RMAP program has been proposed to be expanded to all of Butte Silver-Bow County. This proposal will be in the upcoming release of the Proposed Plan. Once Record of Decision and Consent Decree are final, then the RMAP program will be officially extended to the Greeley Neighborhood and Flat.

7. If there is no PRP for the Greeley Neighborhood and the Flat, from where will the necessary cleanup funds for the area be derived? Who will pay? Will there be enough money for a systematic cleanup?

The EPA is investigating whether there are any remaining viable PRPs for the WSSOU. If there are no viable PRPs for the Site, funding is available through congressional appropriations, which is based on the risk to human health or the environment. Sites compete with each other for funding, this happens in all our programs and Superfund listed sites are prioritized for funding. Due to the human health concerns posed by this site, this site will receive a high priority for funding.

8. If there is no RI/FS, how can the public be assured that sufficient data is available to completely assess the extent of contamination in the Greeley/Flat area?

EPA has been investigating the nature and extent of contamination from past mining activities since 1983. These investigations along with the upcoming RI/FS for the WSSOU have been and will assess the extent of contamination throughout the entire Silver Bow Creek Butte Area Superfund site.

9. If not part of an official Superfund OU, what assurances can the residents of the area have that they will not become simply a Superfund afterthought?

EPA’s mission is to protect human health and the environment. Through our past current and future remediation efforts we are required under CERCLA, i.e. Superfund to investigate and address contamination from past mining activities which could impact human health. The residents of the Greeley neighborhood and all neighborhoods in Butte will not become an afterthought in the cleanup process. We will continue to actively engage with these community

members and groups to provide information on our work, along with education and outreach materials so that they are able to be engaged throughout the Superfund process.

10. Will the current Superfund Health Study be extended to the Greeley Neighborhood and the Flat?

The RMAP plan identifies that Butte-Silver Bow will periodically evaluate medical monitoring (i.e., “biomonitoring”) data approaches and data compiled under the RMAP every 5 years for a period of 30 years. The first of these studies was completed and approved by EPA in 2014. We are in the second study that is due in July of this year. The requirement is a check and balance to ensure that the RMAP continues to be effective and based on the periodic evaluation gives opportunity to make improvements if needed. Now, if the evaluation determined that the RMAP was not effective then we would look at other remedial options. But so far, our studies tell us it is working, blood lead levels here in Butte are trending down faster than comparative communities with the difference, attributed to RMAP. This study looks at data throughout Butte-Silver Bow including the Greeley Neighborhood.

What community involvement activities will be directed to the Greeley Neighborhood and Flat if these areas are not part of an official OU?

Community involvement activities will continue in all parts of Butte to inform and engage the public throughout the Superfund process. These will include public meetings, one on one meetings, drafting informational material such as fact sheets and flyers, as needed, and working with all elected officials to inform the community of our work and progress.